

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID ST. GEORGE

No. 18-mj-05122-JGD

ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant, with the assent of the government and U.S. Probation, respectfully requests that his release conditions be modified to remove the condition that he reside with a third-party custodian.

As grounds therefor, it is the understanding of undersigned counsel that the Court imposed the third-party custodian condition, which was not requested by the government or Probation, out of appropriate concern for the defendant's well-being in the immediate aftermath of his arrest. Now, however, the passage of time has made clear that Mr. St. George is stable and handling his legal and personal situation as well as can be expected. He is also now engaged in appropriate therapy. At this juncture, the presence of a third-party custodian is, if anything, any unnecessary source of stress for an individual who has lived independently for his entire adult life. Mr. St. George remains subject to electronic monitoring and a substantial secured bond to assure his compliance with release conditions.

WHEREFORE, the assented-to request to modify release conditions should be granted.

Respectfully submitted,

DAVID ST. GEORGE
by his attorney,

/s/ William Fick
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/s/ William Fick